

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BRAINWAVE SCIENCE, INC.

Plaintiff

Letter Motion of Dr. Lawrence A. Farwell

- against -

Civil Action No.: 21-cv-4402 (BMC-RLM)

ARSHEE, INC., DR. LAWRENCE A.
FARWELL, DR. THIERRY MAISON and
BRAIN FINGERPRINTING FOUNDATION

Defendants.

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Your Honor:

I am writing to inform you of circumstances beyond my control that are currently limiting my ability to respond to recent developments in the case, and to request time to respond as appropriate.

After my deposition on April 25, I traveled to Champaign, Illinois for a Kung Fu exhibition. (I am a black belt, instructor, and “shifan” [“young master”] in Kung Fu.) On April 30 I sustained a back injury while practicing Kung Fu. Since then I have been resting in bed on doctor’s orders. I have been prescribed hydrocodone-acetaminophen and diazepam, both of which are incompatible with performing mental tasks such as writing legal pleadings. Due to the pain of my injuries, I have trouble sleeping even with sedation. This also makes such activities impractical. Moreover, I am unable to sit up without substantial pain, so writing at a computer is out of the question. My condition has not been improving as expected. Yesterday the doctors ran additional x-rays and an MRI in an effort to determine the extent and nature of my injuries and to determine whether I have a fractured vertebra, torn ligaments, or other as-yet-unknown damage.

I have not read – and in my current condition I cannot read -- any pleadings or other correspondence relating to the case since my deposition on April 25.

I respectfully request that you make whatever ruling is necessary to allow me the necessary time to read and respond to whatever developments have taken place in the case. I realize that this request is inadequately specific. However, it is all I can do in my present condition, and I will rectify any shortcomings as soon as I am physically and mentally able to do so.

My prognosis is unknown at the present time. However, I think it is safe to assume that I will have recovered sufficiently to resume work on the case within two weeks. After that, if additional disclosures or other responses are required, I request an additional 30 days to prepare and submit the same.

I cannot make it to a notary to have this document notarized. However, if requested, I will swear to the accuracy of the information provided herein once I am able to do so. I can also provide supporting documentation such as prescriptions and test results on request.

Lawrence A. Farwell

Dr. Lawrence A. Farwell

Date: May 4, 2022

Email: brainwave@larryfarwell.com

Website: <https://farwellbrainfingerprinting.com>

Phone: +1 206-905-1009

Mobile: +1 206-250-5516

Address: 28375 Sandy Beach Lane NE

PO Box 547

Kingston, WA 98346

cc: Paul Tomkins, Esq.

Dr. Thierry Maison

Arshee, Inc.